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TRANSMITTAL FOR RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION REPORT ADDENDUM AREA OF CONCERN 704 (AOC 704) ZONE E CNC CHARLESTON SC
8/26/2002
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

D H E C
PROMOTE PROTECT PROSPER
2600 Bull Street
Columbia, SC 29201-1708

August 26, 2002

Ms. Amy Daniell
Caretaker Site Office
Charleston Naval Complex
CSO 1895 Avenue F
North Charleston, SC 29405

RE: RFI Report Addendum, Area of Concern 704, Zone E
Charleston Naval Complex (CNC)
SC0 170 022 560

Dear Ms. Daniell:

The Corrective Action Engineering and the Hydrogeology Sections of the South Carolina Department of Health and Environmental Control (Department) have completed the review of the above referenced document, which was received on August 8, 2002. This review was based upon applicable State and Federal Regulations, and the CNC Hazardous Waste Permit, effective May 22, 2002. The Department has determined that the attached comments must be addressed before a final determination may be made concerning this document.

Thank you for your cooperation in this matter. If you have any questions or concerns, please contact me at (803) 896-4285.

Sincerely,

Jerry Stamps, Engineer Associate
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

Attachment:
Memorandum from Jo Cherie Overcash to Jerry Stamps dated August 22, 2002

cc: Tony Hunt, PE, SOUTHDIV
Rob Harrell, PE, SOUTHDIV
Dean Williamson, PE, CH2M-Jones
Paul Bergstrand, P.G., Hydrogeology
Rick Richter, Trident EQC District
Dann Spariosu, PhD, EPA Region 4
Gary Foster, PE, CH2M-Jones

ENGINEERING COMMENTS
Prepared by Jerry Stamps
Charleston Naval Complex (CNC)
August 26, 2002

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1. **General**
   The RFI Addendum Sampling Plan (CH2M-Jones, September 2001) stated that the fist sample location (SB001) would be located in a depression where paint accumulation has occurred. However, the sampling location identified in this report is located approximately ten feet to the west of the location identified in the sampling work plan. This report must provide the rationale for the deviation from the approved work plan.

2. **Section 4.1.2**
   This section states that the surface soil BEQ is below the accepted screening value; however, the calculated value is not provided. Please provide this value in the text.

3. **Tables 4-3 and 4-4, Typographical Error**
   These tables incorrectly identify the use of the SSL based upon a DAF=1 for screening the semi-volatiles and pesticide. Please revise the table such that an SSL based upon a DAF=10 is identified.

4. **Section 5.1, TCE in Soil**
   TCE was detected in one subsurface soil sample at a concentration of 4.3 J ppb. This concentration exceeds that generic SSL of ppb based upon a DAF =1. As agreed in the team notebook, an average concentration was calculated for the area using half of the detection limits for those samples without detectable quantities of TCE. This average concentration, however, still exceeded the SSL screening level. Consequently, a site-specific SSL must be calculated to demonstrate that the TCE concentration in soil does pose a threat to groundwater quality.

   Additionally, the Department does not agree with combining the surface and subsurface soil data to calculate a site-wide average concentration for a particular contaminant, as was done for TCE. Instead, the average concentrations used to compare to the SSLs must be depth interval specific. As such, please revise the text in Section 5.1.

5. **Data Validation Summary**
   It appears as though the majority of the data in this document has been qualified with a "UJ" designation. According to Attachment 1 of the data validation summary, the reason for this qualification is that the holding times were exceeded. However, it does not appear as though an explanation is provided as to why the holding times were exceeded. The Navy must employ its best efforts to ensure that the samples are handled within the holding times as established in the EPA publication SW-846, entitled *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*.

that TCE either leached from the surface to the subsurface or originated from an unidentified subsurface source. Since TCE only slightly exceeds the SSL in the maximum subsurface concentration, an alternative rationale for its elimination as a COPC should be discussed.

If you have any further questions, feel free to contact me at (803) 896-4188.